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January 18, 2024

VIA ECF

Honorable Ann M. Donnelly
United States District Court Judge
United States District Court Eastern District of New York
225 Cadman Plaza East - Courtroom 4GN Brooklyn, NY 11201

Re: <u>Jennifer D. Araoz vs. The New Albany Company LLC, et al.</u>
U.S. District Court, Eastern District of New York - Case No. 1:22-cv-00125

Dear Judge Donnelly:

Plaintiff submits this letter to provide notice of supplemental authority in further support as to the issues raised by Defendant's Motion to Dismiss. [Doc. No. 40] Specifically, please find the following:

- Exhibit A: Order dated 3/20/23 by Judge Rakoff entered in the three cases; *Jane Doe 1 v. Deutsche Bank AG et al*, No. 22-10018; *Jane Doe 1 v. JPMorgan Chase & Co*, No. 22-10019; *Government of the U.S. Virgin Islands v. JPMorgan Chase Bank NA*, No. 22-10904, denying JP Morgan and Deutsche Bank's motion to dismiss against Epstein victims
- Exhibit B: relevant excerpts from Virginia Guiffre's Deposition Transcript unsealed on January 9, 2024 in the action <u>Giuffre v. Maxwell</u>, S.D.N.Y. Case #: 1:15-cv-07433-LAP
- Exhibit C: Opinion in <u>Giuffre v. Prince Andrew</u>, 579 F Supp 3d 429 [SDNY 2022] denying to apply settlement agreement to defendant in that action at pgs. 28-30.

Please do not hesitate to contact the parties should the Court have any questions.

Respectfully Submitted,

<u>/s/ Robert J. Hantman</u>
Robert J. Hantman, Esq.
Counsel for Plaintiff

CC via E-filing: Marion Little Terri Thompson

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